DeltaKeeper
A PROJECT OF SAN FRANCISCO BAYKEEPER

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29 April 1997

Mr Lester A. Snow
Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

RE: Delta Water Quality Monitoring Program

Dear Mr. Snow:

We are writing to express our growing concern that CALFED is on the threshold of approving projects to improve Delta water quality conditions without first prioritizing problems according to their environmental risks, establishing a comprehensive and aggressive program to improve our understanding of water quality-induced beneficial use impairments and developing an inclusive technical process to evaluate the effectiveness of such projects. While we appreciate the enormous burden assumed by those with decision making responsibilities to distribute the largest amount of money ever earmarked for the Delta, we are disturbed that CALFED may be putting the cart before the horse in approving projects without prioritizing them according to sound scientific criteria. Such an approach risks wasting scarce public funds for projects that may have limited effectiveness in addressing real issues of beneficial use impairment in the Delta.

For example, aquatic life toxicity in the Delta and its tributaries is one of the most important, if not the most important, water quality problem facing the Delta. While many people have focused attention on habitat destruction and excessive pumping of Delta water for export as the principal causes of fisheries decline, it is highly likely that aquatic life toxicity plays a major role in affecting the health of the Delta ecosystem for a number of key species. Unfortunately, too little effort is being made today to address the issue of aquatic life toxicity in the Delta and its tributaries.

Currently, there is no water quality monitoring program in the Delta comparable to the San Francisco Estuary Institute's (SFEI) Regional Monitoring Program in San Francisco Bay or the project envisioned for the Sacramento River by the Sacramento River Watershed Program. Given the limited data available on the chemical constituents and pathogenic organisms in the Delta and poor information on real impacts to identified beneficial uses, creation of a comprehensive monitoring project is a crucial first step to the success of any Delta restoration effort.

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We ask that CALFED immediately take steps to fund and implement projects which include:

1. A Delta monitoring program, perhaps modeled after SFEI's successful program, that regularly collects and analyzes constituents in the sediment and water column at a sufficient number of pre-selected sites throughout the Delta. Sufficient provision must be made for bioassays on local and surrogate species and Toxicity Identification Evaluations on samples exhibiting toxicity. The monitoring program must be iterative and of sufficient duration to provide for long-term trend analysis and be flexible enough to permit follow-up on routine and episodic sampling results. It must provide for the long-term evaluation of the impacts and effectiveness of remediation approaches. In addition, the monitoring should be designed to provide data that can be integrated with data from tributary rivers and the Bay, so that a landscape-level evaluation of environmental quality can be performed.
2. Special studies during periods of high intensity runoff, extensive pesticide application and salmon spawning and early recruitment to develop a better understanding of the transport, fate and effects of contaminants.
3. Fish tissue studies and human health risk assessments to develop scientifically defensible, site specific human health advisories. Data should be collected on local species commonly consumed by local populations. Since available information indicates that local consumption rates likely exceed the national average, a special effort should be made to determine actual consumption rates by subsistence fishermen.
4. A bioassessment component to better define the effects of non-chemical discharges (e.g. sedimentation and habitat degradation).
5. A central data collection point that assembles, maps and publishes historic and current monitoring data in a usable and easily understood format. All data must be conveniently accessible by government agencies, researchers and the general public.

Any Delta monitoring project should be conducted in collaboration with existing San Francisco Bay and Sacramento River monitoring programs and should extend up the San Joaquin River and East-side tributaries. Monitoring projects should be accountable to an independent oversight board that includes public members and which has the latitude to initiate target studies as additional use impairments are identified. Where monitoring results demonstrate clearly defined potential problems, the oversight committee should have the responsibility to recommend a course of action to the appropriate authorities. To encourage buy-in by citizens groups and local communities and to maximize limited resources, provision should be provided for the training and funding of volunteer monitoring efforts and educational programs. Finally, a properly formulated risk assessment process is necessary to prioritize projects that are technically valid and cost-effective.

We reiterate that we strongly believe that a comprehensive monitoring program is fundamental to the success of CALFED efforts in the Delta and that the focus of that program should be directed

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toward identifying and evaluating actual water quality beneficial-use impairments, then documenting the improvements achieved. These impairments are inadequately addressed in the draft CALFED program and include, among others: aquatic toxicity, dissolved oxygen depletion, reduced quality of domestic water supplies, excessive eutrophication, chemical bioaccumulation, pathogenic impairment of contact recreation and sediment impairment (i.e. excessive accumulation, oil and grease, litter and toxicity). All proposed projects considered for funding by CALFED should be priortized according to their potential effectiveness in resolving impairments to identified beneficial uses. Such an approach will be the wisest use of limited financial resources.

We hope these comments are of value and look forward to discussing these and other issues with you in the near future.

Sincerely,

Bill Jennings, DeltaKeeper

Mike Lozeau, San Francisco BayKeeper

Jim Crenshaw
California Sportfishing Protection Alliance

Waldo Holt
San Joaquin Audubon Society